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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

NEW YORK MARINE AND
GENERAL INSURANCE COMPANY,
a New York corporation,,

Plaintiff,

v.

Amber Heard, an individual,,

Defendant.

Case No. 2:22-cv-04685-GW(PDx)

Consolidated for Pre-Trial Purposes
with 2:22-CV-04685-GW (PDx)

**JOINT STIPULATION TO
EXTEND TIME FOR NEW YORK
MARINE AND GENERAL
INSURANCE COMPANY TO
RESPOND TO COUNTERCLAIM**

Pursuant to L.R. 8-3, Plaintiff and Counter-Defendant New York Marine and General Insurance Company (“NY Marine”) and Defendant and Counterclaimant Amber Heard (“Heard”) hereby stipulate that NY Marine shall have a thirty-two (32) day extension of time from December 12, 2022 to January 13, 2023 in which to file its response to Heard’s Counterclaim.

The parties have not previously stipulated to any extensions of time for NY Marine to respond to the Counterclaim.

This extension will not alter any date or event already scheduled by the Court, and in fact is calculated to ensure that all relevant motions which the parties intend to or may file are on calendar on or before January 13, 2022, so that the Court may take

1 them into consideration during the January 23, 2023 Scheduling Conference.

2 McCORMICK, BARSTOW, SHEPPARD,
3 WAYTE & CARRUTH LLP

4
5 Dated: December 12, 2022

By: /s/ James P. Wagoner

6 James P. Wagoner

Nicholas H. Rasmussen

7 Graham A. Van Leuven

8 Attorneys for Plaintiff New York Marine and
General Insurance Company

9
10 Dated: December 12, 2022

11 PASICH LLP

12
13 By: /s/ Kayla Robinson

14 Kayla Robinson

Attorney for Defendant Amber Heard

15
16 **CERTIFICATION PURSUANT TO L.R. 5-4.3.4**

17 The undersigned hereby certifies that all signatories to this Joint Stipulation and
18 Application to Modify Scheduling Order concur in the contents of this filing, and have
19 authorized the undersigned to sign and file this document on their behalf.
20

21 Dated: December 12, 2022

22 McCORMICK, BARSTOW, SHEPPARD,
23 WAYTE & CARRUTH LLP

24 By: /s/ James P. Wagoner

25 James P. Wagoner

Nicholas H. Rasmussen

26 Graham A. Van Leuven

27 Attorneys for Defendant New York Marine and
General Insurance Company

28 8789866.1

PROOF OF SERVICE

**New York Marine and General Insurance Company v. Amber Heard
USDC Central District of California, Case No. 2:22-cv-04685-GW-PD**

STATE OF CALIFORNIA, COUNTY OF FRESNO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Fresno, State of California. My business address is 7647 North Fresno Street, Fresno, CA 93720.

On December 12, 2022, I served true copies of the following document(s) described as **JOINT STIPULATION TO EXTEND TIME FOR NEW YORK MARINE AND GENERAL INSURANCE COMPANY TO RESPOND TO COUNTERCLAIM** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 12, 2022, at Fresno, California.

/s/ Heather Ward

Heather Ward

SERVICE LIST

**New York Marine and General Insurance Company v. Amber Heard
USDC Central District of California, Case No. 2:22-cv-04685-GW-PD**

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